



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 3, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan:

Attached please find the parties' joint request to charge and proposed verdict sheet. The Government is docketing a redacted version today and submitting the unredacted versions to the Court. The redline text in the documents reflect the objections of the defense. Further detail of the parties' objections are contained in comment bubbles.

The Government has proposed the only redactions in the Request to Charge. These proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although the Government's request to charge is a judicial document subject to the common law presumption of access, the proposed redactions are narrowly tailored to protect the privacy interests of a third party.

The Government is also providing under seal Exhibit A, which pertains to a defense comment. The defense informs the Government that this exhibit is a document from another case

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that was not itself publicly docketed and therefore is submitting Exhibit A under seal.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____ s/

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Cc: Defense Counsel (By ECF)